

Exhibit 6

From: Casey L. Shomaker <cshomaker@McKoolSmith.com>
Sent: Tuesday, September 2, 2025 12:57 PM
To: Jonathan H. Hicks; AA_Intellectual_Ventures
Cc: Intellectual Ventures; Allen Gardner
Subject: RE: IV v. American - Deposition Availability

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Jonathan,

American declines IV's invitation to violate the Court's scheduling order. Claim construction discovery is closed. IV has not moved to re-open claim construction discovery. As such, IV's offer to depose these individuals at this stage is improper. See, e.g., *Staton Techiya, LLC v. Samsung Elecs. Co.*, Case No. 2:21-cv-00413-JRG-RSP, 2023 WL 2169025, at *1 (E.D. Tex. Feb. 21, 2023); *Trilogy Commc'ns, Inc. v. Times Fiber Commc'ns, Inc.*, 109 F.3d 739, 745 (Fed. Cir. 1997) (citing *Geiserman v. MacDonald*, 893 F.2d 787, 791 (5th Cir. 1990)); see also Fed. R. Civ. P. 16(B)(4).

Regards,

McKool Smith

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From: Jonathan H. Hicks <Jhicks@kasowitz.com>
Sent: Thursday, August 28, 2025 6:33 PM
To: AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>
Cc: Intellectual Ventures <IntellectualVentures@kasowitz.com>; Allen Gardner <Allen@allengardnerlaw.com>
Subject: IV v. American - Deposition Availability

Counsel,

Dr. Eyal de Lara is available for remote deposition on Wednesday, September 3rd starting at 8 am ET and Dr. Joseph Camp is available for remote deposition on Thursday, September 4th starting at 9 am ET.

Best,
Jonathan

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